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April 15, 2025

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Hon. Paul A. Engelmayer
United States District Court for the
Southern District of New York
40 Foley Square, Room 1305
New York, NY 10007

RE: *Gordon Surgical Group, P.C. et al. v. Empire HealthChoice HMO, Inc. et al.*
Civil Action No. 1:25-cv-03035-PAE
Consent Motion for Stay

Your Honor:

We represent Plaintiff in this lawsuit. We jointly submit this letter with Defendants' counsel to request a stay of this action while the parties continue to negotiate a global resolution of Plaintiff's claims in this case and the other cases pending before other courts in this District.

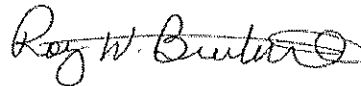
It has taken the parties longer than anticipated to reach a resolution given the number of claims at issue and the age of some of those claims. Thus, in the interest of judicial economy and so as to not further burden the Court, the parties respectfully request a 90-day stay of this action, including all conferences and deadlines. The parties will endeavor to finalize settlement and file a stipulation of dismissal within those 90 days.

We thank Your Honor for your consideration of this matter.

RWB:

Respectfully,

cc: Valerie Sirota, Esq.



Roy W. Breitenbach

GRANTED. The case is hereby stayed. The parties are to file a joint status update no later than July 15, 2025, and every 30 days thereafter.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

Date: April 16, 2025